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July 21, 2009

VIA ELECTRONIC AND FIRST CLASS MAIL

Laura Johnson, Remedial Project Manager (3HS23) (johnson.laura@epa.gov)
DE, VA, WV Remedial Branch
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Peck Iron & Metal - GATX Corporation Response to May 20, 2009, General Notice Letter

Dear Ms. Johnson:

On May 20, 2009, the United States Environmental Protection Agency ("USEPA") issued a General Notice Letter ("GNL") to GATX Corporation ("GATX") to inform GATX that it may incur, or may have incurred, liability under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), with respect to the Peck Iron and Metal Site located in Portsmouth, Virginia ("Site").

USEPA requested that GATX provide a response to the GNL within thirty days of the receipt of the GNL. By email dated June 18, 2009, James VanOrden, on behalf of USEPA, granted GATX an additional thirty days to prepare and submit its response to the GNL. This letter sets forth the response of GATX to the GNL.

First, GATX would like to express its appreciation for the additional information that Mr. VanOrden and Joan Martin-Banks have provided GATX regarding the site.

In response to this additional information, GATX performed additional records searches. GATX has not been able to find any records or information which indicate that GATX sent hazardous materials to the Site. As GATX explained in its October 24, 2008, response to the USEPA



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104(e) request for information, it appears that GATX may only have sent, if anything, whole, intact, clean tank cars to the Site for the sole purpose of recycling the valuable steel comprising nearly the entire tank car.

GATX, however, is willing to participate in future discussions with USEPA with regard to the Site, in particular, at the point at which USEPA is in a position to consider a cash-out settlement in exchange for a release of claims and contribution protection. GATX's willingness to engage in any such discussions is not an admission of any liability for the Site.

If you or USEPA has any further questions, please feel free to contact me at (610) 458-4987. Thank you for your time and consideration.

Best regards,

Christopher M. Roe

CMR:djh

cc: Marland O. Webb, Esq. (via electronic mail only - marland.webb@gatx.com)
James VanOrden, Esq. (via electronic mail only - vanorden.james@epa.gov)
Joan E. Martin-Banks (via electronic mail only - martin-banks.joan@epa.gov)